

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS SCHENK TO INTERROGATORY OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM WITNESS KINGSLEY
(OCA/USPS-T39-16a)

The United States Postal Service hereby provides the responses of witness Schenk to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T39-16a, filed on December 5, 2001. Interrogatory OCA/USPS-T39-16a was redirected from witness Kingsley.

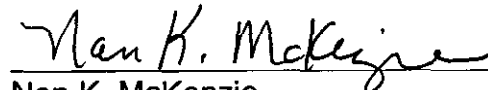
The interrogatory is stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
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December 19, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS SCHENK TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS KINGSLEY**

OCA/USPS-T39-16a. Please refer to the response to VP/USPS-4, Attachment A.

- a. Refer to the response to part a., where it references “manual sortation cost pools,” “allied cost pools,” and “mechanized sortation cost pools” in Attachment A.
 - i. Please list the “manual sortation cost pools” from Attachment A.
 - ii. Please list the “allied cost pools” from Attachment A.
 - iii. Please list the “mechanized sortation cost pools” from Attachment A.

RESPONSE:

- i. The cost pools referred to as “manual sortation cost pools” are MANL and Manual Letter (Non-MODs).
- ii. The cost pools referred to as “allied cost pools” are 1CANCMPP, 1OPPref, 1PLATFRM, 1POUCHNG, and Allied (Non-MODs).
- iii. The cost s referred to as “mechanized sortation cost pools” are BCS/, BCS/DBCS, and OCR.

DECLARATION

I, Leslie M. Schenk, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

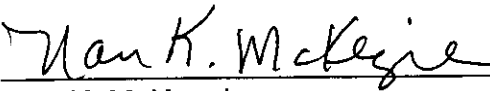


Leslie M. Schenk

Dated: 12/19/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Nan K. McKenzie

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